

ENTERED

October 20, 2023

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY
COURT FOR THE SOUTHERN DISTRICT OF
TEXAS HOUSTON DIVISION**

In re: Fieldwood Energy III LLC, et al., Post-Effective Date Debtors¹.	§ § § § § §	Case No. 20-33948 (MI) Chapter 11 Jointly Administered
--	----------------------------	---

**STIPULATION AND AGREED ORDER EXTENDING RESPONSE DATE
AND RESETTING HEARING DATE ON PLAN ADMINISTRATOR'S
OBJECTION TO RED WILLOW OFFSHORE, LLC'S
PROOF OF CLAIM
[this relates to Dkt. No. 2833]**

This stipulation and agreement (the “**Stipulation**”) is entered into by and among (i) David Dunn, the plan administrator (the “**Plan Administrator**”) appointed pursuant to the Notice of (I) Entry of Oeder Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Docket No. 2016]²; and Red Willow Offshore, LLC (“**RWO**”) regarding the Plan Administrator’s Objection to the Proof of Claim of Red Willow Offshore, LLC [Docket No. 2833] (the “**Objection**”). The Parties hereby stipulate and agree as follows:

WHEREAS, on or about November 25, 2020, RWO timely filed Proof of Claim Number 617 (the “**RWO Claim**”).

WHEREAS, the Plan Administrator filed his Objection to the RWO Claim on August 15,

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtor), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Plan.

2023, which included a response date of September 14, 2023 and an initial pre-trial hearing on October 2, 2023 @10:30 am CT.

WHEREAS, on September 12, 2023, the Plan Administrator and RWO filed a Stipulation and Agreed Order Extending Response Date and Resetting Hearing Date on Plan Administrator's Objection to Red Willow Offshore, LLC's Proof of Claim;

WHEREAS, on September 13, 2023, the Court entered the Stipulation and Agreed Order Extending Response Date and Resetting Hearing Date on Plan Administrator's Objection to Red Willow Offshore, LLC's Proof of Claim which included a response date of October 18, 2023 and an initial pre-trial hearing on November 6, 2023 at 10:00 am (the "Initial Stipulation");

WHEREAS, the Parties have agreed to enter into and jointly submit this Stipulation further extending RWO's response date and resetting the date of the initial pre-trial hearing in connection with the Objection.

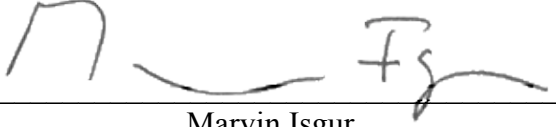
NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. RWO's deadline to respond to the Objection is extended to and through December 13, 2023, subject to further extensions based on the Parties' agreement.
2. The initial pre-trial hearing on the Objection is reset to January 24, 2024 at 9:00 a.m., or such later time as the Court directs.

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first written below.

IT IS SO ORDERED

Signed: October 19, 2023


Marvin Isgur
United States Bankruptcy Judge

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first below written.

Dated: October 18, 2023

**BOND ELLIS EPPICH SCHAFFER JONES
LLP**

**BARNET B. SKELTON, JR.
ATTORNEY AT LAW**

By: /s/ Aaron Guerrero
Ken Green
Texas Bar No. 24036677
Aaron Guerrero
Texas Bar No. 24050698
Bryan Prentice
Texas Bar No. 24099787
950 Echo Lane, Suite 120
Houston, Texas 77024
(713) 335-4990 telephone
(713) 335-4991 facsimile
Ken.green@bondsellis.com
Aaron.guerrero@bondsellis.com
Bryan.prentice@bondsellis.com

By: : /s/ Barnet B. Skelton, Jr.
Barnet B. Skelton, Jr.
Texas State Bar No. 18456400
815 Walker, Suite 1502
Houston, Texas 77002
Telephone (713) 516-7450
Facsimile: (713) 659-8764
Email: barnetbjr@msn.com

**ATTORNEY FOR RED WILLOW
OFFSHORE, LLC**

**ATTORNEYS FOR DAVID DUNN, PLAN
ADMINISTRATOR FOR THE POST-
EFFECTIVE DATE DEBTORS**